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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES JOSEPH SCANLAN
a/k/a Alex Michaels,

Defendant.

CASE NO. 2:16-CR-00250-GMN-CWH

**UNOPPOSED MOTION TO AMEND
CONDITIONS OF PRETRIAL RELEASE
TO DISCONTINUE
LOCATION MONITORING**

Comes now Defendant Charles Joseph Scanlan, by and through counsel, Colleen E. McCarty, Esq., of the law firm of Gentile Cristalli Miller Armeni Savarese, and Christopher Adams, Esq., of the Law Office of Christopher Adams, P.C., hereby seek an Order discontinuing location monitoring.

Counsel for Mr. Scanlan has conferred with the attorney for the government and with the pretrial services officer supervising Mr. Scanlan regarding this request. Neither the prosecutor nor the pretrial services officer oppose this request.

MEMORANDUM OF POINTS AND AUTHORITIES

By way of this motion, Mr. Scanlan requests that the location monitoring be discontinued. Electronic location monitoring was ordered as part of the original bond set in South Carolina. Mr. Scanlan has been on bond and subject to electronic location monitoring

1 since December 2015. The parties and the Pretrial Services Officer believe that the electronic
2 monitoring is no longer necessary to address any risk of nonappearance or danger to the
3 community the defendant posed at the time of his initial appearance. Any continuing risk can be
4 addressed by the remaining conditions of release.

5 **WHEREFORE**, Mr. Scanlan asks the court to Order the location monitoring
6 discontinued.

7 DATED this 21st day of September, 2016.

8 GENTILE CRISTALLI
9 MILLER ARMENI SAVARESE

10 */s/ Colleen E. McCarty*

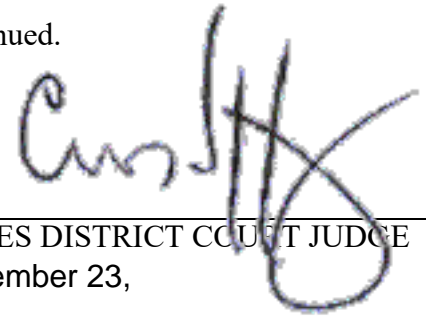
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21 **[PROPOSED] ORDER**

22 The Court, having reviewed the UNOPPOSED MOTION TO DISCONTINUE
23 LOCATION MONITORING, and Good Cause Appearing therein, HEREBY ORDERS that
24 electronic location monitoring of Defendant shall be discontinued.

25 IT IS SO ORDERED.

26 
27 UNITED STATES DISTRICT COURT JUDGE
28 September 23,
DATED: 2016